

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

## **DEFENDANT'S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(6), defendant Stephen J. Griffin, by his counsel Pollack Solomon Duffy LLP, respectfully moves this court to dismiss the Complaint in its entirety. Defendant Stephen J. Griffin submits the enclosed Memorandum of Law and a Declaration of Phillip Rakhunov, dated December 28, 2020, in support of this motion.

Dated: December 28, 2020

Respectfully submitted,

STEPHEN J. GRIFFIN

By: /s/ Phillip Rakhunov  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that plaintiff Amy St. Pierre is being served with a copy of this Motion by via Electronic Filing as an authorized *pro se* user (see ECF No. 4 & 12/24/2020 Order) and by email at amy.stpierre25@gmail.com.

/s/ Phillip Rakhunov